

1 Hardeep Sull, Esq.
2 Nevada Bar No. 12108
3 **SULL & ASSOCIATES, PLLC**
4 520 S. 7th Street, Suite A
5 Las Vegas, NV 89101
6 Tel.: (702) 953-9500
7 Fax: (702) 297-6595
8 dee@sullglobal.com
9 *Attorneys for Plaintiffs*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 *****

13 SANDOR ANIVAL CORDOVA
14 CARBALLO, er al.,

15 Plaintiff,

16 v.
17 WILLIAM BARR, et al.,

18 Defendant.

Case No. 2:20-cv-013150APG-BNW

**STIPULATION TO EXTEND
DEADLINE TO FILE AMENDED
COMPLAINT, ANSWER, and
(First Request)**

19 Plaintiffs, by and through their respective counsel of record, stipulate and request that
20 the Court extend the deadline for Plaintiffs to file their amended complaint from the current
21 deadline set by the Court of October 9, 2020, for ten days up to and including October 19, 2020,
22 the deadline for all Defendants' deadlines to file their answer or responsive pleading until
23 Friday, November 6, 2020, and the deadline to file their stipulated discovery plan and
24 scheduling order. The stipulation for these extensions is being sought pursuant to Local Rule of
25 Practice LR IA 6-1. This is the first request to extend the deadline for Plaintiffs to file their
26 amended complaint, defendants to file their answer or responsive pleading, and the deadline to
27 file the stipulated discovery plan and scheduling order.
28

1 In support of this Stipulation to Extend the deadline to file their Amended Complaint,
2 the parties state as follows:

3 1. The Court entered an order partially dismissing Plaintiffs' habeas corpus claims
4 and claims of other Plaintiffs on September 30, 2020 [ECF No. 46]. In this Order, the Court set
5 a deadline for Plaintiffs to file their amended complaint by October 9, 2020.
6

7 2. Counsel for both parties have conferred regarding Plaintiffs' request for an
8 extension of time due to Plaintiff's counsel's family health emergency, and Defendants' counsel
9 have all agreed to stipulate to extend the deadline for Plaintiffs to file their amended complaint
10 from the current deadline set by the Court of October 9, 2020, for ten days up to and including
11 Monday, October 19, 2020.
12

13 3. The parties further conferred and agreed to extend all Defendants' deadlines to
14 file their answer or responsive pleading until Friday, November 6, 2020.
15

16 4. The parties have also conferred and agreed to extend the deadline to file their
17 stipulated Discovery Plan and Scheduling Order on Friday, November 6, 2020.

18 5. These requested extensions are being brought in good faith, for good cause
19 shown, and are not sought for any improper purpose or other purpose of delay.
20

21 WHEREFORE, the parties respectfully request that the Court extend the deadline for
22 Plaintiffs to file their amended complaint from the current deadline set by the Court of October
23 9, 2020, for ten days up to and including Monday, October 19, 2020, the deadline for all
24 Defendants' deadlines to file their answer or responsive pleading until Friday, November 6,
25 2020, and the deadline to file their stipulated discovery plan and scheduling order on Friday,
26 November 6, 2020.

27 IT IS SO ORDERED.

28 DATED this 9th day of October, 2020.

Dated: October 9, 2020



ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

SULL & ASSOCIATES, PLLC

/s/ Hardeep Sull

Hardeep Sull, Esq. (NV Bar No. 12108)
520 S. 7th Street, Suite A
Las Vegas, NV 89101
Tel.: (702) 953-9500
Fax: (702) 297-6595
dee@sullglobal.com
Attorneys for Plaintiffs

STRUCKLOVE, BOJANOWSKI & ACEDO, PLC

/s/ Jacob Lee
Jacob Lee
Ashlee B. Hesman
3100 West Ray Road, Suite 300
Chandler, Arizona 85226
JLee@strucklove.com
AHesman@strucklove.com

Gina G. Winspear
DENNETT WINSPEAR
3301 North Buffalo Dr., Suite 195
Las Vegas, NV 89129
GWinspear@dennetwinepar.com

Attorneys for Respondent Brian Koehn

NICHOLAS TRUTANICH
United States Attorney

/s/ Brianna Smith
Brianna Smith
501 S. Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Brianna.Smith@usdoj.gov

Attorneys for Respondent

1
2
3
4
5
6 IT IS SO ORDERED.
7

8 Dated this _____ day of October, 2020.
9

10 _____
11 UNITED STATES DISTRICT COURT JUDGE
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28